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## EGRG ROCKY FLATS

OE ORDER: 4700./ 25 RF00129

EG&G ROCKY FLATS, INC

ROCKY FLATS PLANT P O BOX 464 GOLDEN COLORADO 80402 0464 (303) 966 7000

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EDAHL T ILBIG JG January 4, 1995

95-RF-00129

Jessie M Roberson Acting Director for Environmental Restoration Program Division

SITEWIDE TREATMENT FACILITY - MCB-001-95

Refs (a) B I Williamson ltr (12646) to M C Broussard, Operable Unit No 1 and Operable Unit No 2 Treatment Plant Consolidation, December 21, 1994

(b) B I Williamson Itr (12949) to M C Broussard, Treatment Plant Consolidation Guidance, December 23, 1994

Action Attend meeting on January 5, 1995 to close open items

develop a more effective process for project review and approval

This letter is in response to the referenced letters requesting project justifications and cost analysis for the Sitewide Treatment Facility Attachment 1 provides information on the anticipated waters requiring on-site treatment and a brief explanation of the benefits of treatment consolidation. This information had been provided previously to your staff at a November 30, 1994 meeting Attachment 2 is the schedule for the overall Field Treatability Unit (FTU) integration, including IM/IRA revisions and the addition of iron prefiltration This information was also provided to your staff in a November 30, 1994 meeting

XX A detailed cost analysis can be completed by January 25, 1995 at a cost of \$6,400. This cost was not included in the existing workscope. In order to maintain the critical path schedule, on-going work must continue during this time period or the July operational date cannot be met

The Sitewide Treatment Facility work package was approved by DOE prior to the current fiscal year and staff have been dedicated to fulfilling the workscope as outlined. We want to ensure that all DOE issues with any project are resolved. It is unfortunate that questions regarding project justification and cost are being raised several months after the Sitewide Treatment Facility project was approved. We would like to work with you and your staff to

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J M Roberson 95-RF-00129 January 4, 1995 Page 2

The schedule for the Sitewide Treatment Facility project had slipped by several weeks to address earlier DOE concerns and has recently been accelerated. We anticipate the project will be back on schedule by mid-January. In order to ensure that we have effectively addressed all DOE concerns without further schedule impact, we recommend a meeting to discuss any remaining issues and have scheduled such a meeting for Thursday, January 5, 1995 at noon in your office.

EG&G Regulatory Experts have reviewed the Sitewide Treatment Facility scope and existing decision documents. It is our opinion that the previously approved Operable Unit 7 (OU 7) Proposed Action Memorandum allows OU 7 waters to be treated at OU 1, OU 2 or the Sitewide Facility. Notification of our choice needs to be documented and submitted but no further reviews or approvals are required. The OU 1 IM/IRA allows the OU 1 treatment facility to treat the contaminants found in the OU 7 waters. Operable Unit 1 Interim Measures/Interim Remedial Action (IM/IRA) will continue to be followed as written EG&G will modify the OU 2 IM/IRA to remove "at site" treatment and replace with "appropriate treatment at a sitewide facility. This change may require public comment but can be accomplished within the given time frame.

In order to accept additional water sources at the Sitewide Facility a new IM/IRA will be written. Start up operations for OU 2 and OU 7 are not contingent on this Sitewide IM/IRA EG&G will have modified IM/IRAs to DOE on February 3, 1995 and EG&G will provide the draft Sitewide IM/IRA for review on or before April 1, 1995. It is anticipated a minimum of 180 days after that date are required for final regulatory approval of the sitewide document.

At the December 21, 1994 meeting with your staff it was confirmed that OU 7 would indeed use the OU 1 FTU with the addition of an iron pre-filtration system. The existing treatment unit subcontractor has been requested to procure and install this system at the OU 1 FTU. It will be procured and installed prior to June 1, 1995. It is a grain sand filter iron removal system that supplements the existing system by providing an in-line filter of off loaded waters to remove iron prior to water entering the treatment storage tanks. It is an off-the-shelf pre-designed and assembled unit requiring no engineering or other support. It will be operational prior to the June 30, 1995. OU 7 milestone and will be utilized until the OU 2 rad removal system is in place for OU 7 waters.

We regret our inability to support a requested meeting with Brandon Williamson of your staff on December 22, 1994 Brandon did not attend the December 21, 1994 project meeting and we attempted to work with him to schedule an additional meeting at his request It is unfortunate that we were unable to find a time that both DOE staff and knowledgeable EG&G staff could meet due to the holiday schedule

J M Roberson 95-RF-00129 January 4, 1994 Page 3

If you need further information, please feel free to contact me at extension 8517

M C Broussard, Operations Manager Environmental Operations Management

EG&G Rocky Flats, Inc

Attachments As Stated (2)

Orig and 1 cc - J M Roberson

CC

F Lockhart - DOE, RFFO

K Muenchow - " "

J Ramp - " "

B I Williamson - "

B - McCarthy - SAIC

J Stewart -

WATER DRIVERS: Source	Quantity	Start Date	End Date
Scheduled 881 Hillside Recovery well 881 Hillside Collection well OU-2 SW-59 seep OU-7 seep water Decon-Facility water Purge water	0 5 gpm 0 5 gpm 1 gpm 4 gpm 5000 gal/mo 200 gal/quarter	Collecting Collecting Collecting 6/30/95 Collecting Collecting	Indefinite Indefinite Indefinite 12/97 (est ) Indefinite Indefinite
Expected OU-4 groundwater	4 gpm	Jan 1996	Past FY2000
Planned OU-2 pump and treat	10 gpm	Jan 1996	Past FY2000

## COST/BENEFITS:

The present sampling, operations, and maintenance costs for the OU-1 and OU-2 water treatment facilities is approximatly \$3.5 million per year. The total influent to the two facilities, combined, is less than two gallons per minute (less than one gpm during summer/fail). Operations costs for the STF are estimated to be \$3.0 million per year, saving \$500,000 per year as soon as the facility is operational. The only increased costs for treating the OU-7 water at the STF will be for increased chemical use (minimal cost, < 1.5%) and transportation costs (which would be required, wherever the water would be treated). Most of the operations costs are fixed, and irrelevant of the volume of water being treated. By treating the OU-7 water, and other sources, the cost per gallon to treat water decreases significantly, reducing the overall cost to DOE for water treatment.

The \$1.5 million price tag for the STF will payoff after three years of treating the OU-1 and OU-2 water. Since this water is expected to require treatment indefinitely, the STF is the most economic way to handle these waters. Additionally, by utilizing selective treatment, the OU-2 seep water will be treated without using the Radionuclide Removal System, thus eliminating the generation of low-level mixed waste.

In comparison, if the OU-7 seep water required its own treatment facility, design, approval, construction, and operations costs would easily exceed the \$1.5 million level the first year

The more water that the STF treats, the less the overall cost will be to DOE. By utilizing one treatment facility environmental waters can be treated simply, with less waste generation and lower operating costs.

If the STF project is canceled, significant additional funding will be required for OU-1, OU-2, OU-4, OU-7, and other sources to treat and handle environmental waters. Since all of these water sources are regulated by EPA and the State, funding would have to be pulled from other projects to fund their treatment. Development of the STF will save DOE millions of dollars during the remediation of the RFETS site.

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1294950020	EOM SUBMIT PLID, LOCATION, & ORD	13DEC94A	16DEC94A	4	
1294950025	ENGINEERING RESPOND W/SCOPE, COST & P&ID	3JAN95	11JAN95	12	.53.
1294950030	BEGIN DESIGN	12JAN95	13FEB95	23	
1294950035	PRE-DESIGN COMPLETE		13FEB95	0	
1294950040	THREE WEFY DESIGN REVIEW	14FEB95	1MAR95	12	
1294950045	DESIGN COMPLETE	-	1MAR95	0	<b>\Q</b>
					PROCESS EQUIPMENT BID PROCESS
1294950285	ADVERTISE BID FOR PROCESS EQUIP INSTALL	- 2MAR95	14MAR95	6	
1294950290	SITE VISIT	15MAR95	15MAR95	1	
1294950295	RESPOND TO QUESTIONS	16MAR95	22MAR95	ช	
1294950300	RECEIVE BIDS	23MMR95	23MAR95	٦	
1294950305	EVALUATE BIDS	24MAR95	6APR95	10	
1294950310	AWARD CONSTRUCTION SUBCONTRACT		6APR95	0	
					PROCESS EQUIPMENT PRECONSTRUCTION
1294950340	EGAG DEVELOP DRAFT IMCP FOR CONST	7APR95	7APR95	1	
1294950320	KICKOFF MIG WITH SUBCONTPACTOR	10APR95	12APR95	Э	
1294950325	SUBCONTRACTOR SUBMIT BID BREAKDOWN	13APR95	20APR95	'n	
1294950330	SUBCONTRACTOR SUBVIT SCHEDULE	13APR95	20APR95	ช	
1294950335	SUBCONTRACTOR SUBMIT PERSONMEL LIST	13APR95	20APR95	5	
1294950345	EG&G FINALIZE IWCP FOR CONSTRUCTION	24APR95	314AY95	8	
1294950350	SUBCONTRACTOR PERSONNEL TRAINING	4MAY95	10MAY95	5	
					INSTALLATION OF PROCESS EQUIPMENT
1294950355	CONTRACTOR PURCHASE EQUIPMENT	11MAY95	1JUN95	15	
1294950360	CONSTRUCTION HES PLAN REVIEW & APPROVE	23UN95	8JUN95	5	
1294950365	CONSTRUCTION PERMITS	2JUN95	8JUN95	5	
1294950370	CONTRACTOR MOBILIZES	9JUN95	14JUN95	Þ	
1294950375	CONSTRUCTION	15JUN95	27JUL95	30	
1294950380	CONTRACTOR PREPS & DELIVERS OPS MANUALS	7.301.95	27JUL95	15	***************************************
1294950385	SO TESTS FOR PREFILTRATION PROJECT	7.JUL.95	20JUL95	10	
1294950390	CONSTRUCTION COMPLETE		27JUL95	0	→
1294950395	PROJECT CLOSE-OUT	28JUL95	17AUG95	15	
					NEPA DETERMINATION
1294950090	REQUEST NEPA DETERMINATION	14DEC94A	14DEC94A	1	
1294950095	PROVIDE NEPA DOCUMENTATION	15DEC94A	19DEC94A		
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1294950105	REVIEW ADM & FORWARD TO DOE	25JAN95	27JAN95	3	
1294950110	DOE CONCURRENCE	30JAN95	16FEB95	14	
					READINESS REVIEW
1294950115	INITIAL READINESS REVIEW STATUS MTG	13DEC94A	13DEC94A	1	
1294950120	INITIAL RR DRAFT CHECKLIST	20DEC94A	20DEC94A	1	
1297950125	RR CHECHLIST REVIEW	930095	9JAN95	1	
1294950130	FINALIZE RR CHECYLIST	31JAN95	31JAN95	1	
1294950135	APPROVED RR CHECKLIST	8FEB95	8FEB95	1	
					OU-1 & OU-2 IM/IRA MODS
1291950400	DRAFT MODS TO DOE	3FEB95	3FEB95	1	
1294950410	DOE 1ST REVIEW	6FEB95	16FEB95	6	
1294950420	EGAG INCORPORATE COMMENTS	17 FEB95	28FEB95	8	
1294950430	DOE SUB 'IT TO STATE - PREP FOR PUBLIC COTIENT	1MAR95	31MAR95	23	
1294950440	PUBLIC CO.WENT	3APR95	28APR95	19	
1294950450	COPRECT COAMENTS, SUBMIT TO STATE	1MAY95	15MAY95	11	
1294950460	III/IRA HODS COMPLETE		15MAY95	0	
					NEW IM/IRA
1294950599	DRAFT IM/IRA TO DOE	3APR95	3APR95	1	
1294950600	DOF 1ST REVIEW	4APR95	28APR95	18	
1224950610	EGGG INCORPORATES COATENTS	1MAY95	31MAY95	22	
1294950670	DOE SUBMIT TO STATE - PREP FOR FUBLIC COUNTENT	1JUN95	30JUN95	22	
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